

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation

MDL No. 1358
C.A. No. 1:00-1898 (SAS)
M21-88

This Document Relates To:
Commonwealth of Puerto Rico, et al. v.

DECLARATION OF
MICHAEL A. WALSH

Shell Oil Company, et al.,
Case No. 07-CV-10470-SAS
Case No. 14-CV-1014-SAS

I, Michael A. Walsh, hereby declare as follows:

1. My name is Michael A. Walsh. I am over the age of twenty-one, reside in Dallas, Texas, and am competent to give testimony. The facts set forth in the declaration are based upon my personal knowledge. I am a partner at Strasburger & Price, LLP and counsel for defendant Tauber Oil Company (“Tauber Oil”) in the above-referenced matters. I submit this declaration in support of Tauber Oil’s Motion to Dismiss for Lack of Personal Jurisdiction.

2. A true and correct copy of deposition excerpts from the deposition of Tauber Oil’s Rule 30(b)(6) witness Kevin Wilson is attached as Exhibit A.

3. A true and correct copy of the relevant pages from Defendant Chevron Phillips Chemical Puerto Rico Core, LLC’s Second Amended Objections and Responses to Plaintiffs’ First Set of Interrogatories and Request for Production of Documents to Defendants Regarding Supply and Distribution (LNFS 54951591) are attached as Exhibit B.

4. A true and correct copy of deposition excerpts from the deposition of Phillips Core Puerto Rico Witness Don Sitton is attached as Exhibit C.

5. A true and correct copy of the Declaration of Daryl Vance, dated April 30, 2013 (LNFS 52049530) is attached as Exhibit D.

6. A true and correct copy of the Defendant ConocoPhillips Company's Objections and Responses to Plaintiffs' First Set of Interrogatories and Request for Production of Documents to Defendants Regarding Supply and Distribution (LNFS 53086238) is attached as Exhibit E.

7. A true and correct copy of a letter of Jessica Farley dated August 9, 2013 (LNFS 53623798) submitted to the Court is attached as Exhibit F.

8. A true and correct copy of the Affidavit of Hector Marin (LNFS 54047154) is attached hereto as Exhibit G.

9. A true and correct copy of Plaintiffs' Responses and Objections to Defendant Tauber Oil Company's First Set of Interrogatories and Requests for Production of Documents to Plaintiffs regarding Jurisdictional Discovery (LNFS 54580394) is attached as Exhibit H.

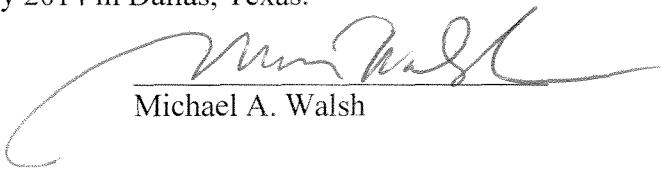
10. A true and correct copy of deposition excerpts of Hector Marin is attached as Exhibit I.

11. To date, Tauber has participated limitedly in this case to obtain discovery from Plaintiff to ascertain any evidence it (or any other party) has in support of the Commonwealth's allegation that the Commonwealth has personal jurisdiction over Tauber.

12. Tauber further participated to the extent necessary to comply with Orders of the Court, including complying with Court ordered deadlines.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 28th day of February 2014 in Dallas, Texas.


Michael A. Walsh